

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**IN THE MATTER OF NON-PARTY  
SUBPOENA SERVED IN:**

ABN AMRO Capital USA LLC; Société Générale;  
BNP Paribas; Natixis, New York Branch;  
Macquarie Bank Limited; Bank Hapoalim BM;  
The Bank of Tokyo-Mitsubishi UFJ Ltd., New  
York Branch; and Israel Discount Bank of New  
York,

Plaintiffs,

v.

Peter G. Johnson, Peter B. Johnson, Mary Johnson,  
Timothy Johnson, Thomas Reich, Richard Gary  
O'Connor, Nancy Pizzi, and William Yu,

Defendants.  
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Case No. \_\_\_\_\_

[Original case pending in the United  
States District Court for the District of  
New Jersey, Civ. Action No. 2:18-  
00246-SDW-CLW]

**NOTICE OF MOTION TO QUASH SUBPOENA TO NON-PARTY  
AMERRA CAPITAL MANAGEMENT, LLC PURSUANT TO FED. R. CIV. P. 45**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, dated November 30, 2018, accompanying Declaration of John G. Hutchinson, dated November 30, 2018, with exhibits annexed thereto, non-party AMERRA Capital Management, LLC (“AMERRA”) will move this Court at the United States District Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time designated by this Court, for an Order, pursuant to Rule 45 of the Federal Rules of Civil Procedure, quashing the non-party subpoena for documents issued by the plaintiffs in the proceeding *ABN AMRO Capital USA LLC, et al. v. Johnson*, No. 2:18-cv-00246 (D.N.J.) to AMERRA, which demands compliance in New York, at

the offices of Reid Collins & Tsai LLP, and for such other relief as the Court deems just and proper.

Dated: New York, New York  
November 30, 2018

SIDLEY AUSTIN LLP

By: /s/ John G. Hutchinson  
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